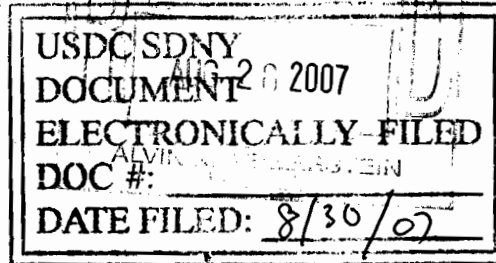


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August 24, 2007



Time to respond
is enlarged
to September
28, 2007.

VIA FACSIMILE

Honorable Alvin K. Hellerstein
Southern District of New York
Room 1050
United States Courthouse
500 Pearl Street
New York, New York 10007

 8/30/07
Port I Judge
LAURA TAYLOR SWAIN U.S.D.J.

Re: Weeks Marine, Inc. v. Bridgestone, et. al. (CASE NO. 07-CV-06811-AKH)

Dear Judge Hellerstein:

We represent Vanni Scodeggio, one of the defendants in the above referenced matter presently before this Court. We, along with counsel for Misao Hioki, another defendant in this case, write to respectfully request a 30 day extension of time in which to answer or otherwise respond to the Complaint filed in this action. Prior to this instance, neither Mr. Scodeggio nor Mr. Hioki has made any request for extension of time before this Court.

Plaintiffs filed the Complaint in this action on July 27, 2007. Mr. Scodeggio was served with a summons and the Complaint on or about August 9, 2007. Presently, Mr. Scodeggio's answer or other response to the Complaint is due August 29, 2007. Mr. Hioki was served with a summons on August 8, 2007. Mr. Hioki's answer or other response to the Complaint is due August 28, 2007. Mr. Scodeggio respectfully requests an additional 30 days to answer or otherwise plead in this action. If Mr. Scodeggio's request is granted, his answer or response would be due on September 28, 2007. Mr. Hioki asks for an additional 30 days to answer or otherwise respond as well. If granted, Mr. Hioki's answer or response would be due on September 27, 2007.

Counsel for Mr. Scodeggio has conferred by telephone with counsel for Plaintiff, Robert G. Eisler, of Cohen, Milstein, Hausfeld & Toll, PLLC, in New York, New York, regarding Mr. Scodeggio's request for an extension of time to answer or otherwise respond to the Complaint. Plaintiff's counsel was unwilling to consent to this request. Mr. Eisler refused to

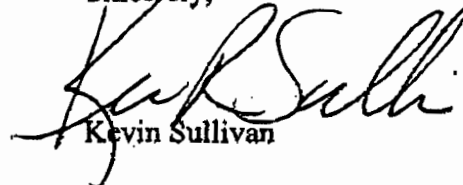
Honorable Alvin K. Hellerstein
August 24, 2007
Page 2

elaborate and provided no rationale for his position. Likewise, counsel for Mr. Hioki conferred by telephone with counsel for Plaintiff, Seth Gassman of Cohen, Milstein, Hausfeld & Toll, PLLC, in New York, New York, regarding Mr. Hioki's request for an extension of time to answer or otherwise respond to the Complaint. Mr. Gassman was unwilling to consent to Mr. Hioki's request. Mr. Gassman refused to elaborate or provide rationale for his refusal to consent to an extension.

Defendants Scodeggio and Hioki are not requesting the extension to delay. Rather, the extension would allow for appropriate time to confer with the client and evaluate appropriate defenses and/or motions. Moreover, because there are related and to some extent overlapping complaints that have been filed in other federal districts, a short term delay would allow for the appropriate organization of multiple cases. Plaintiff Weeks has filed a motion for MDL certification before the Judicial Panel on Multidistrict Litigation which is pending. Additionally, the plaintiff in at least one complaint apparently similar to this Complaint has asked the court, pursuant to Federal Rule of Civil Procedure 42(a), to consolidate it with several similar actions that have been filed in the United States District Court for the Southern District of Florida, including *Shipyard Supply LLC v. Bridgestone Corp.*, CIV-07-21282, *Expro Gulf Ltd. v. Bridgestone Corp.*, CIV-07-21464, and *Shipyard Supply LLC v. Allison*, CIV-07-21592 (hereafter "the Shipyard Complaints"). Defendants Scodeggio and Hioki will support Plaintiff's motion for MDL certification. Because this Complaint and the other similar complaints have largely overlapping claims, the likelihood of MDL treatment is significant, and the likelihood of a transfer either from this Court or to this Court is also significant.

Defendants Scodeggio and Hioki, therefore, respectfully request that you grant their requests for an additional 30 days in which to answer or otherwise respond to the Complaint in this action.

Sincerely,



Kevin Sullivan

cc: See attached Service List

SERVICE LIST

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*on behalf of itself and all others similarly
 situated represented by*

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